

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: David and Lisa Moore §
§ Bankruptcy Case No. 10-40579-H1-12
Debtor(s). §

**AGREED EMERGENCY MOTION FOR DEBTOR'S COUNSEL ALEXANDER
B. WATHEN TO WITHDRAW**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THIS MOTION SHOULD NOT BE GRANTED.

IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THIS MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

The Debtors have decided to end Mr. Wathen's representation of them and hire other counsel for this Chapter 12 proceeding and have hired Jon Parchman who has filed a Motion to Appear Pro Hac Vice which the Court has now granted. The Debtors wish that this Motion be given the Court's immediate attention in order to avoid incurring additional fees to prepare for the March 26 hearing. Should the Court decide to hold a hearing on this Motion it is desired that it be no later than March 21 due to preparation issues and Mr. Wathen is unavailable March 24-26.

Respectfully Submitted,

3/16/14
Date

/s/ Alexander B. Wathen
Alexander B. Wathen
Attorney for Debtor(s)
Texas Bar No. 24005122
S.D. Tex. No. 22793
13280 Northwest Freeway, Suite F352
Houston, TX 77040
Ph. (281) 999-9025
Fax (281) 616-6242
wathenecf@gmail.com

CERTIFICATE OF SERVICE

I certify that on March 16, 2014, or at the very latest the next day after the document was filed, I have or am contemporaneously serving a copy of these documents with all attachments on those entities listed below either by first class mail or through the Clerk by electronic mail.

3/16/14
Date

/s/ Alexander B. Wathen
Alexander B. Wathen

BY ELECTRONIC MEANS THROUGH THE CLERK OR BY FIRST CLASS MAIL:

Ronald H. Tonkin, by email for Ms. Bushman

David and Lisa Moore, by email.